

1 William B. Rowell, Bar No. 178587
2 Thiele R. Dunaway, Bar No. 130953
3 Marc Brainich, Bar No. 191034
4 Michele C. Kirrane, Bar No. 215448
5 **FENNEMORE WENDEL**
6 1111 Broadway, 24th Floor
7 Oakland, CA 94607
8 Tel: (510) 834-6600 / Fax: (510) 834-1928
9 browell@fennemorelaw.com
10 rdunaway@fennemorelaw.com
11 mbrainich@fennemorelaw.com
12 mkirrane@fennemorelaw.com

13 Attorneys for Defendants
14 County of Alameda and Alameda County Deputy
15 Sheriff Joshua Mayfield

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 JOSEPH P. CUVIELLO and DENIZ
19 BOLBOL, individually,

20 Plaintiffs,

21 v.

22 ROWELL RANCH RODEO, INC.;
23 HAYWARD AREA RECREATION AND
24 PARK DISTRICT; HAYWARD AREA
25 RECREATION AND PARK DISTRICT
26 PUBLIC SAFETY MANAGER/RANGER
27 KEVIN HART; ALAMEDA COUNTY
28 SHERIFF'S OFFICE; ALAMEDA COUNTY
and DOES 1 and 2, in their individual and
official capacities, jointly and severally,

Defendants.

Case No. 3:23-cv-01652-VC

**STIPULATION FOR CONTINUANCE
OF DISCOVERY DATES;
[PROPOSED] ORDER**

Action Filed: April 6, 2023
Trial Date: October 21, 2024

STIPULATION

The parties appearing in this action, Plaintiffs JOSEPH P. CUVIELLO and DENIZ BOLBOL, and Defendants ROWELL RANCH RODEO, INC., HAYWARD AREA RECREATION AND PARK DISTRICT, HAYWARD AREA RECREATION AND PARK DISTRICT MANAGER/RANGER KEVIN HART, ALAMEDA COUNTY, ALAMEDA COUNTY DEPUTY SHERIFF JOSHUA MAYFIELD, by and through their respective undersigned counsel, hereby enter into the following stipulation:

1. The parties have diligently conducted discovery in this case, including the exchange of Initial Disclosures and two sets of written discovery and the production of voluminous documents;

2. The parties attended a Mandatory Settlement Conference on October 16, 2023; the case did not, however, resolve at that time;

3. The parties are also currently meeting and conferring to schedule the depositions of plaintiffs Joseph P. Cuvillo and Deniz Bolbol, defendants Deputy Joshua Mayfield and Kevin Hart, and non-party Gary Houts;

4. However, because of the schedules of the parties and their counsel, including several trials set for the month of January 2024 and the first half of February 2024, the parties will not be able to complete the depositions of these five witnesses by the January 31, 2024 discovery cut off or even by February 29, 2024;

5. So that the parties can complete their investigation, discovery, and trial preparation, and in turn have sufficient information with which to engage in further meaningful settlement discussions, the parties jointly request that the current Close of Fact Discovery be continued from January 31, 2024 to March 15, 2024; the current Designation of Experts deadline be continued from March 31, 2024 to April 19, 2024; and the current Close of Expert Discovery be continued from May 1, 2024 to May 24, 2024;

6. The requested extensions of time will not otherwise affect the Court's schedule for the case, as set forth in the Court's Minute Order dated July 14, 2023, Docket No. 64;

1 7. The parties have not previously stipulated to or requested an extension of time for
2 any deadline set by the Court, other than extensions of time to respond to written discovery.

3 IT IS THEREFORE AGREED, STIPULATED, AND REQUESTED THAT:

4 1. The current Close of Fact Discovery be continued from January 31, 2024 to March
5 15, 2024; the current Designation of Experts deadline be continued from March 31, 2024 to April
6 19, 2024; and the current Close of Expert Discovery be continued from May 1, 2024 to May 24,
7 2024;

8 2. The other dates set by the Court's Minute Order dated July 14, 2023, Docket No.
9 64, will remain unchanged.

11 Dated: December 28, 2023

GREENFIRE LAW, PC

13 By: /s/ Jessica L. Blome
14 Jessica L. Blome
15 Lily A. Rivo
16 Attorneys for Plaintiff
17 Deniz Bolbol

16 Dated: December 28, 2023

IN PRO PER

18 By: /s/ Joseph P. Cuvillo
19 Joseph P. Cuvillo
20 Plaintiff

20 Dated: December 28, 2023

21 ALLEN, GLAESSNER, HAZELWOOD &
22 WERTH, LLP

23 By: /s/ Dale L. Allen, Jr.
24 Dale L. Allen, Jr.
25 Nicholas D. Syren
26 Attorneys for Defendants
27 Hayward Area Recreation and Park
28 District and Kevin Hart

Dated: December 28, 2023

GORDON REES SCULLY MANSUKHANI
LLP

Dated: December 28, 2023

FENNEMORE WENDEL

By:/s/ *Marc Brainich*

William B. Rowell
Thiele R. Dunaway
Marc Brainich
Michele C. Kirrane
Attorneys for Defendants
County of Alameda and Alameda County
Deputy Sheriff Joshua Mayfield

PROPOSED ORDER

A STIPULATION FOR CONTINUANCE OF DISCOVERY DATES was jointly presented by Plaintiffs Joseph P. Cuvillo and Deniz Bolbol and Defendants Rowell Ranch Rodeo, Inc., Hayward Area Recreation and Park District, Kevin Hart, County of Alameda, and Alameda County Deputy Sheriff Joshua.

The Court, having considered the parties' Stipulation, and good cause appearing therefor,
HEREBY ORDERS that:

8 1. The current Close of Fact Discovery is continued from January 31, 2024 to March
9 15, 2024; the current Designation of Experts deadline is continued from March 31, 2024 to April
10 19, 2024; and the current Close of Expert Discovery is continued from May 1, 2024 to May 24,
11 2024;
12 2. The other dates set by the Court's Minute Order dated July 14, 2023, Docket No.
13 64, will remain unchanged.

IT IS SO ORDERED.

Dated: January 3, 2024

Hon. Vince Chhabria
United States District Judge